



# **QUAD LOCK GROUP MODERN SLAVERY STATEMENT 2025**

## **MODERN SLAVERY STATEMENT**

This modern slavery statement is made in compliance with the Modern Slavery Act 2018 (Cth) (the Act) on behalf of the Quad Lock Group.

Quad Lock strongly supports governmental mechanisms aimed at addressing violations of human rights. This Statement outlines Quad Lock's operations and supply chains, modern slavery risks, actions taken by Quad Lock to date, the effectiveness of those actions and the approach taken during our first reporting period.

This Statement sets out the current state of operations and identifies areas of improvement. This Statement is backed by Quad Lock's steadfast commitment to consistent and continuous improvement, and a willingness to recognise the risks in our current state and to undertake the necessary actions to minimise and mitigate those risks.

## **REPORTING ENTITY**

The Quad Lock Group reporting entities are referred to collectively in this statement as "Quad Lock" (we/us/our).

The registered office and principal place of the Quad Lock businesses is Suite 6A, Level 3 The Como Centre, 299 Toorak Road, South Yarra VIC 3141 Australia.

## **OUR STRUCTURE AND OPERATIONS**

Quad Lock specialises in the design, development, manufacture, and supply of smartphone cases and mounting systems to individual consumers and commercial customers under the Quad Lock brand. Our products are sold online (direct-to-consumer) via our owned websites, on third party marketplaces such as Amazon and eBay and to commercial customers comprising wholesale distributors and specialty retailers.

Our team of 120 people work from our head office facility in South Yarra VIC. We also have a team of five people in China who are primarily engaged in quality assurance activities relating to the contract manufacturing of our products.

Quad Lock products are contract manufactured in China and Malaysia, and exported through our distribution network which is managed by a third-party freight forwarder. A network of third-party logistics providers manages the fulfilment and delivery of customer orders via a global network of parcel carriers.



Quad Lock recognises that there are potential risks of modern slavery in its supply chains, including Tier 2 and 3 suppliers. Quad Lock is committed to undertaking a more in-depth risk assessment of its suppliers during 2026, which will inform the future strategic direction that Quad Lock will embark upon in order to reduce risk associated with modern slavery.

## **GOVERNANCE AND POLICY FRAMEWORK**

Quad Lock is committed to compliance with all applicable laws and standards where we directly operate. We also expect our suppliers to do the same in the regions they operate in. We fully acknowledge that risks of modern slavery exist in any complex supply chain, particularly where raw materials are procured by our suppliers from one or more other companies that we have no direct interaction with or knowledge of.

Quad Lock has allocated an internal 'Steering Committee' with responsibility for overseeing and implementing Quad Lock's commitment to eliminating and reducing the risk of modern slavery from its operations and supply chains. Additionally, the team is responsible for investigating, addressing and reporting on any potential modern slavery practices that may be associated with Quad Lock or its suppliers. The team is supported by key professionals with diverse experience across various fields, including human resources, finance, supply chain, logistics and operations.

## **OUR SUPPLY CHAIN**

Quad Lock engages contract manufacturing partners to produce the majority of the Quad Lock products in China and Malaysia using a wide range of raw materials and components which are supplied by both Chinese and overseas based suppliers and manufacturers.

We have identified approximately 15 direct suppliers to our business. Of these suppliers we have applied a risk-based approach to identify higher risk suppliers for the purposes of modern slavery compliance. We commenced a systematic program of Azolla certified ethical audits which commenced in 2022. The Azolla certified ethical audits assess each manufacturing facility across a broad range of metrics including, but not limited to:

- labour practices
- occupational health, safety & hygiene
- child, underage, forced and prison labour
- employee hours, wages and benefits

## **DESCRIPTION OF MODERN SLAVERY RISK IN OUR SUPPLY CHAIN**

The majority of our suppliers are based overseas. Due to the nature of the products we source from those overseas suppliers many procure the raw materials required for production from overseas and then supply finished, assembled products to Quad Lock.

We acknowledge that the risks of modern slavery may be heightened in our supply chain and operations as a result of the geographical location of some suppliers, our areas of operation, and the source of materials used in products supplied to us. We acknowledge that China and Malaysia are high-risk countries for modern slavery. We also acknowledge that we lack visibility in certain overseas markets and this carries additional risks of modern slavery especially in secondary levels of our chain of suppliers and source materials used in our group's goods and services.

The assessment of modern slavery risks is undertaken by the Quad Lock Operations team. In order to undertake an assessment of the modern slavery risks to the business we have undertaken a risk-based analysis of our expenditure. This analysis includes an assessment of the type of product or services supplied to us; the geography of supply; and any specific known supplier issues.

## **ACTIONS TAKEN AND ASSESSMENT OF EFFECTIVENESS**

We have assessed the risks of modern slavery impacting our business and have integrated this into our supplier approval and risk management process. This integration is an on-going activity across our business and will extend to inclusion in our policy and procedural documentation and practices.

We recognize that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon.

Through the audit process, we have identified key areas for improvement and have been actively collaborating with our suppliers to address them. Significant progress has been made in enhancing safety measures and operational processes. Additionally, we have optimized our ordering cycles to establish a more consistent workflow, effectively minimizing manufacturing peaks and troughs reducing the need for overtime. These adjustments have contributed to a safer and more stable work environment for employees.

## **CONTINUOUS IMPROVEMENT**

We have commenced and will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

We are committed to continuous improvement of our systems and processes to reduce the risks of modern slavery in our supply chain into the future. This will include:

- Continued training of our staff;
- Progressively rolling out new supply agreements;
- Reviewing closely any suppliers deemed to have elevated risk; and
- Mandating annual ethical and social audits for Tier 1 suppliers aligned with industry-recognized standards eg: BSCI, SMETA, ISO9001, ISO14001, or equivalent.

## **HOW WE ASSESS THE EFFECTIVENESS OF OUR RESPONSE**

During this reporting period, our focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains.

We have commenced and will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

The audits have confirmed that our suppliers maintain strong ethical, social, and environmental standards. However, one notable area for improvement was identified with a specific supplier regarding overtime during peak demand periods.



To address this, we have implemented significant enhancements to our supply chain and forecasting processes to minimize fluctuations and establish a more consistent workflow. Furthermore, we are collaborating closely with the supplier to ensure they receive timely and sufficient communication regarding order volumes. This proactive approach will enable them to better plan their staffing requirements, thereby reducing the reliance on overtime.

As at the date of this modern slavery statement, Quad Lock is not aware of any modern slavery occurring in its operations or supply chains.

## CONSULTATION

Quad Lock has produced this modern slavery statement through consultation with the executive leadership team and key leaders within the business.

All of the entities listed in this statement have common Directors and Officers are aligned across the Quad Lock Group.

## APPROVAL

This statement was approved by the Board of Key Topco Pty Ltd on 18 December 2025 and is signed by Andrew Poole in his capacity as a Director. This modern slavery statement has been adopted across all entities within the Quad Lock Group.

*Andrew Poole*

**Andrew Poole**  
Director

## DEFINED TERMS:

**Quad Lock Group** is comprised of the following entities:

**Annex Products Pty Ltd** ABN 89 154 777 401, **Quad Lock Pty Ltd** ACN 602 131 171, **Key Bidco Pty Ltd** ABN 77 642 829 589, **Key Midco Pty Ltd** ABN 56 642 829 436, **Key Holdco Pty Ltd** ABN 28 642 828 948, **Key Topco Pty Ltd** ABN 44 642 828 199, **Thule Bidco Pty Ltd** ACN 682 155 040 and **Thule Holdco Pty Ltd** ACN 682 154 338.